

AGNIFILO INTRATER

July 3, 2025

VIA ECF

Honorable Edward S. Kiel
United States District Judge
District of New Jersey
Mitchell H. Cohen Building & US Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: United States v. Brockmeier, et al., 20-CR-800 (ESK)

Dear Judge Kiel:

We write on behalf of our client, Trent Brockmeier, to respectfully request a two week extension of our deadline to submit objections to the draft pre-sentence investigation report. The reason for this request is that I have just concluded a trial in the matter of United States v. Sean Combs, 24-CR-542 and my associate, David Gelfand, is currently on trial in the matter of United States v. Aasim Boone, 23-CR-292. Accordingly, we require additional time to sufficiently review the draft PSR's contents, confer with counsel for Mr. Johnston, and prepare any appropriate objections. With this extension, our objections would be due on July 23, 2025. The Probation Department, by Probation Officer Maribel Perez, has no objection to this request.

We thank the Court for its consideration of this request.

Respectfully submitted,



Marc Agnifilo

cc: All Counsel (via ECF)